

<b>JUANA VILLEGAS,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>No. 3:09-0219</b>
	)	
<b>THE METROPOLITAN GOVERNMENT</b>	)	<b>Judge Haynes</b>
<b>OF DAVIDSON COUNTY/NASHVILLE --</b>	)	
<b>DAVIDSON COUNTY SHERIFF'S</b>	)	<b>JURY DEMAND</b>
<b>OFFICE, et al.,</b>	)	
	)	
<b>Defendant.</b>	)	

Plaintiff Juana Villegas respectfully submits this proposed jury verdict form, contained on a separate page after the signature page and certificate of service. She provided a proposed jury verdict form to defendant Metropolitan Government of Davidson County—Davidson County Sheriff’s Office (“Metro” or “DCSO”) on August 4, 2011. Metro did not provide Ms. Villegas with any alternative jury verdict form or suggest any edits or alterations to the form proposed by Ms. Villegas. Instead, Metro took the position that each side would submit a proposed jury verdict form to the Court. According, Ms. Villegas respectfully submits the attached proposed jury verdict form.

Based on the Court's rulings on various evidentiary issues, the evidence received at trial, and any alternative jury verdict form proposed by Metro, Plaintiff would reserve the right to propose additional or alternate questions on this jury verdict form as warranted. An electronic copy of this proposed jury verdict form is available for the Court.

Respectfully Submitted,

/s/ John L. Farringer IV

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**CERTIFICATE OF SERVICE**

Service of the foregoing was accomplished through the Court's Electronic Filing System on this 9th day of August, 2011, upon the following:

Kevin Klein  
Allison Bussell  
Metropolitan Department of Law  
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/s/ John L. Farringer IV

## **PROPOSED JURY VERDICT FORM**

This verdict form has been prepared for your convenience. In order for you as a jury to answer each question, each juror must agree to the answer. In other words, your answers to each question must be unanimous. Your foreperson will write the unanimous answer of the jury in the space provided after each question, and will date and sign the form of special verdict when completed. Nothing said in this verdict form is meant to suggest what your verdict should be. You alone have the responsibility for deciding the verdict .

### **QUESTIONS**

1) For non-economic damages, please state the reasonable amount that will fairly compensate Plaintiff for any past, current and/or future physical or emotional injuries resulting from Defendant's shackling of Plaintiff during her final active stages of labor and post partum recovery and/or Defendant's refusal to provide her with access to a breast pump.

**Answer: \$**\_\_\_\_\_

2) For economic damages, please state the reasonable amount that will fairly compensate Plaintiff for any future treatment and care (psychological, psychiatric, and/or medical) she is reasonably certain to need as a result of Defendant's conduct.

**Answer: \$**\_\_\_\_\_

SO SAY WE ALL, this \_\_\_\_ day of \_\_\_\_\_, 2011.

\_\_\_\_\_  
Jury Foreperson